

David A. Hubbert
Deputy Assistant Attorney General

Tijuhna A. Green (TXBN 24106025)
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Washington, D.C. 20044
202-616-3340
202-307-0054 (f)
Tijuhna.A.Green@usdoj.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

CODY J. CHRISTENSEN;
SARA CHRISTENSEN;
REPUBLIC SILVER STATE
DISPOSAL; LAS VEGAS VALLEY
WATER DISTRICT;
CLARK COUNTY, NEVADA.

Defendants.

Case No. 2:22-cv-00605-JAD-BNW

**JOINT MOTION TO APPROVE
STIPULATION TO EXTEND
RESPONSE DEADLINE**

Plaintiff, the United States of America, and Defendant Cody J. Christensen,
pursuant to LR IA 6-1 and the Court's Minute Order (ECF No. 16) hereby agree and
stipulate as follows:

1. On April 11, 2022, the United States filed its complaint to reduce to judgment
the unpaid federal tax liabilities of Cody J. Christensen and to foreclose on real property

1 located at 3238 E. Oquendo Road, Las Vegas, Nevada 89120 (“Subject Property”). ECF
2 No.1.

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4 2. The United States claims that federal tax liens encumber the Subject Property.
5 These federal tax liens relate to defendant Cody J. Christensen’s federal income tax
6 liabilities for tax years 2007–2008 as well as trust fund recovery penalties assessed against
7 him related to unpaid employment taxes of Corporate Capital Team, Inc. for all for
8 quarters of tax year 2009. ECF No. 1. ¶¶ 23 & 26.

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10 3. On May 1, 2022, Mr. Christensen was served with a copy of the United
11 States’ Complaint and summons. ECF No. 5. Accordingly, Mr. Christensen’s response to
12 the United States’ Complaint was due on or before May 23, 2022. Mr. Christensen,
13 however, moved to extend his deadline to respond (ECF No. 14), which this Court denied
14 without prejudice shortly thereafter. ECF No. 16.

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17 4. In line with the Court’s Minute Order directing the Parties to confer,
18 undersigned counsel and Mr. Christensen discussed this case and Mr. Christensen’s
19 requested extension on May 26, 2022. The Parties agreed to a 45-day extension, which
20 will allow Mr. Christensen to file his response, if any, to the United States’ Complaint on
21 or before July 12, 2022.

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24 5. The additional time requested will also allow the Parties an opportunity to
25 determine whether a resolution of the United States’ claims may be reached without
26 further litigation. To the extent that the parties cannot resolve this matter without further
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litigation, the additional time will also permit Mr. Christensen to seek or obtain legal counsel.

6. This Joint Motion is not interposed for the purposes of delay.

7. No party will be unduly prejudiced if this Court grants this request.

8. This is the Parties' first joint motion to extend the response deadline to the United States' Complaint.

WHEREFORE, the United States and Mr. Cody J. Christensen respectfully request that this Court grant their Joint Motion/Stipulation and allow Mr. Christensen until July 12, 2022 to answer or otherwise respond to the complaint in this case.

Dated: June 1, 2022

David A. Hubbert
Deputy Assistant Attorney General

s/ Tijuhna A. Green
TIJUHNA A. GREEN
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Washington, D.C. 20044
202-616-3340
Tijuhna.A.Green@usdoj.gov
Attorney for the United States of America

Dated: June 1, 2022

s/Cody J. Christensen
CODY J. CHRISTENSEN
3238 E. Oquendo Rd.
Las Vegas, NV 89120
702-670-9473
Codychristensen89@gmail.com
Pro Se Defendant

ORDER

IT IS SO ORDERED

DATED: 7:49 pm, June 02, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE